3960 Howard Hughes Parkway, Suite 500 Las Vegas, NV 89109 Phone: (702) 990-3583 / Fax: (702) 990-3501	1 2 3 4 5 6 7	Ismail Amin, Esq. (NV Bar No. 9343) Lawrence Kulp, Esq. (NV Bar No. 7411) Breane Stryker, Esq. (NV Bar No. 13594) THE AMIN LAW GROUP, NV., LTD. 3960 Howard Hughes Parkway, Suite 500 Las Vegas, Nevada 89169 Telephone: (702) 990-3583 Facsimile: (702) 990-3501  Attorneys for Plaintiff, ABBEY DENTAL CENTER, INC.  UNITED STATES DISTRICT COURT			
	8	DISTRICT OF NEVADA			
	9		<u>-</u>		
	10	ABBEY DENTAL CENTER, INC., a Nevada Corporation,	) Case No. 2:15-cv-02069-GMN-PAL		
	11	Plaintiff,	) STIPULATION AND (PROPOSED) ) ORDER TO STAY PROCEEDINGS ) (4th Request)		
	13	vs.	) (4th Request)		
	14 15	CONSUMER OPINION LLC, a Nevada Limited liability company; DOES 1-10; and ROE ENTITIES 1-10, inclusive,	) ) )		
	16	Defendant(s).	) )		
	17				
	18	Plaintiff, ABBEY DENTAL CENTER, INC., and Defendant, CONSUMER OPINION			
	19	LLC, by and through their respective, undersigned counsel, do hereby stipulate and agree as			
	20	follows:			
	21	1. The aforesaid parties are currently actively engaged in settlement negotiations			
	22	in regards to the instant matter.			
	23	2. On January 6, 2016, the parties stipulated to stay the proceedings in this matter			

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- 3. The Court entered the parties' stipulation as an Order on January 14, 2016.
- 4. The Court's Order was due to expire on February 5, 2016.
- 5. Due to continuing settlement discussion, the parties stipulated to stay the matter for a second time on February 3, 2016.
- The Court entered the parties' second stipulation as an Order on February 9, 6. 2016.
- 7. Due to continuing settlement discussion, the parties stipulated to stay the matter for a third time on March 3, 2016.
  - 8. The Court entered the parties' third stipulation as an Order on April 7, 2016.
- 9. Productive settlement discussions are still ongoing, and accordingly, in an effort to facilitate those efforts, as well as to minimize attorneys' fees and other legal expenses, the parties believe that the present civil action should be stayed for an additional thirty (30) days.
- 10. Therefore, the parties agree that the Court may enter the following Order and request that the Court do so accordingly:
- Except as otherwise provided below, this action shall be stayed for a a. period of thirty (30) days from the date this stipulation is filed with the Court.
- b. The stay shall immediately terminate upon Plaintiff's filing with the Court, and serving upon Defendant, a notice that Defendant must file an answer to Plaintiff's complaint in this action or otherwise respond to same in accordance with the Federal Rules of Civil Procedure and by no later than twenty-one (21) days after service of the notice.

1	c. The parties stipulate that nothing	ing in this delay shall be deemed to prejudice		
2	Defendant's right to file an Anti-SLAPP motion, under NRS 41.635 et. seq.			
3	SO STIPULATED AND AGREED on this 7th day of April, 2016.			
4				
5	THE AMIN LAW GROUP, NV., LTD.	RANDAZZA LEGAL GROUP, PLLC		
6	/s/Ismail Amin Esa	/s/ Marc J. Randazza, Esq.		
7		MARC J. RANDAZZA, ESQ.		
,	=	Nevada Bar No. 12265		
8	3960 Howard Hughes Parkway, Suite 500	4035 South El Capitan Way		
	Las Vegas, Nevada 89169	Las Vegas, Nevada 89147		
9	Telephone: (702) 990-3583	Telephone: (702) 420-2001		
10	Attorney for Plaintiff	Attorney for Defendant		
11				
12				
12		IT IS SO ORDERED.		
13		$\mathcal{M}_{\cdot}$		
14		LINUS CEL TECC DICEPLATE HIDAE		
15		UNITED STATES DISTRICT JUDGE		
16		Dated. April 20, 2016		
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	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Defendant's right to file an Anti-SLAPP motion of SO STIPULATED AND AGREED of THE AMIN LAW GROUP, NV., LTD.  THE AMIN LAW GROUP, NV., LTD.  S/ Ismail Amin, Esq. ISMAIL AMIN, ESQ. Nevada Bar No. 9343 3960 Howard Hughes Parkway, Suite 500 Las Vegas, Nevada 89169 Telephone: (702) 990-3583  Attorney for Plaintiff  Attorney for Plaintiff  Attorney for Plaintiff  Response of the Amin Anti-SLAPP motion of the Amin Address of the Amin Address of the Amin Address of the Amin Amin Address of the Amin Amin Amin Amin Amin Amin Amin Amin		

The Amin Law Group, NV., Ltd.
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Las Vegas, NV 89169
Phone: (702) 990-3583 / Fax: (702) 990-3501 

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 7th of April, 2016, I served a true and correct copy of:						
STIPULATION AND (PROPOSED) ORDER TO STAY PROCEEDINGS (4th Request),						
postage fully prepaid and addressed to the following:						
serving the following parties via US Mail, postage prepaid;						
X serving the following parties via CM/ECF;						
serving the following parties via facsimile;						
serving the following parties via Overnight Express;						
Marc J. Randazza, Esq. 3625 South Town Center Drive Las Vegas, NV 89135  Attorney for Defendant						